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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

13 THE CENTER FOR INVESTIGATIVE) No. CV-4:21-cv-03826-KAW
14 REPORTING, et al.,)
15 Plaintiffs,) **JOINT STATUS REPORT**
16 v.)
17 UNITED STATES DEPARTMENT OF)
18 LABOR,)
Defendant.)

Pursuant to the Court’s May 19, 2022 Order (ECF No. 29), Plaintiffs The Center for Investigative Reporting and Michael Montgomery (“Plaintiffs”) and Defendant United States Department of Labor (“DOL”) (collectively, “the Parties”), by and through their counsel, hereby submit this Joint Status Report in connection with this Freedom of Information Act case:

23 1. The Parties have met and conferred and agree that all issues relating to Defendant's
24 obligation to produce records under FOIA have been resolved, and that the only outstanding unresolved
25 issues relate to Plaintiffs' claim for attorney's fees and costs.

2. Plaintiffs have provided Defendant with information regarding their claim for attorney's fees and costs. Defendant is in the process of analyzing that information and obtaining approvals to

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1 enter into negotiations to attempt to resolve Plaintiff's claim for attorney's fees and costs.

2 3. The Parties further agree that additional time is needed so that the Parties can attempt to
3 resolve Plaintiff's claim for attorney's fees and costs without the need for further litigation. The Parties
4 believe that continuing the meet-and-confer process for this additional period is likely to be productive
5 in further narrowing the issues, and could potentially eliminate the need for further Court involvement.

6 4. The Parties propose to submit a further joint status report to the Court on September 15,
7 2022, setting forth any remaining areas of dispute. If at that time the Parties have not resolved
8 Plaintiffs' claim for attorney's fees and costs and no such resolution appears imminent, the Parties shall
9 include in their status report a joint proposed briefing schedule for Plaintiffs' motion for attorney's fees
10 and costs.

11 DATED: July 14, 2022

Respectfully submitted,

12 STEPHANIE M. HINDS
United States Attorney

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14 /s/ *David M. DeVito**
15 DAVID M. DEVITO
SHARANYA MOHAN
Assistant United States Attorneys

16 Attorneys for Defendant

17 DATED: July 14, 2022

THE CENTER FOR INVESTIGATIVE
REPORTING

18 _____
19 /s/ *D. Victoria Baranetsky*
D. VICTORIA BARANETSKY

20 Attorneys for Plaintiffs

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27 * In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
28 of perjury that counsel for Plaintiffs has concurred in the filing of this document.